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September 23, 1999

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Post-It® Fax Note	7671	Date	9/23/99 # of pages 2
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**SUBJECT: Programmatic Environmental Impact Statement/
Environmental Impact Report**

We have reviewed the subject document and offer the following comments:

- The EIS/EIR is not sufficient, as it does not adequately address the impacts of the Watershed Program. General watershed health has a clear beneficial impact on all four primary objectives of CALFED. The discussions are brief and appear to be written without a clear concept of watershed management, see following comment. Without the impacts of watershed management being properly addressed, CALFED funding and support of the Watershed Program will continue to be inadequate.
- The EIS/EIR does not adequately address the impacts of the Watershed Program on Water Supply and Water Management (p. 5.1-36). The second paragraph does not address the changes in the timing of flow release from a well-managed watershed. Proper forest and range management will result in lower peak runoff rates and increased base flow rates during the growing season. This could result in an increase in usable runoff from the watershed. As worded, this paragraph could be interpreted as an advocacy of clear cutting without reforestation. The second paragraph under Watershed Program needs to be rewritten.
- The EIS/EIR has greatly improved the discussion of the impacts of the Water Transfer Program on groundwater resources over the previous March 1999 Draft. Several locations in the document assume ground subsidence *will* occur. Since most ground subsidence is irreversible, it should not be allowed to continue to occur. The CMARP and adaptive management process must be react quickly should subsidence occur to prevent further subsidence.
- The EIS/EIR fails to adequately address the impacts of the Program on recreational use of reservoirs. Reduction in available agricultural and M&I water from CVP and SWP (Project) reservoirs may cause an increase in water use from non-Project reservoirs, resulting in lower water levels in the non-Project reservoirs, a third-party impact. The impacts of reoperation of Project on non-Project reservoirs should be addressed.

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